

Exelon Generation Company, LLC Dresden Nuclear Power Station 6500 North Dresden Road Morris, IL 60450-9765 www.exeloncorp.com

Nuclear

10 CFR 50.73

January 7, 2002

PSLTR: #02-0003

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

Dresden Nuclear Power Station, Unit 2 Facility Operating License No. DPR-19

NRC Docket No. 50-237

Subject:

Licensee Event Report 2001-005-00, "Unit 2 Scram due to Increased First Stage Turbine Pressure"

Enclosed is Licensee Event Report 2001-005-00, "Unit 2 Scram due to Increased First Stage Turbine Pressure," for the Dresden Nuclear Power Station (DNPS). This event is being reported in accordance with 10 CFR 50.73 (a)(2)(iv)(A), which requires the reporting of any event or condition, which resulted in manual or automatic actuation of the Reactor Protection System (RPS).

The following actions were taken:

Training on this event was provided to Operations regarding the effect on Unit 2 with respect to turbine first stage SCRAM setpoint changes due to implementation of Extended Power Uprate and the relationship between shell warming and its impact on RPS logic.

Enforcement of expectations with regard to adherence to established operations standards was performed by the Shift Operations Supervisor (SOS) to all Operations crews.

Panel monitoring expectations were established by the SOS and incorporated into Operations standing orders.

Revised the operations procedure for Main Turbine Startup, to include a requirement to place an operator selected alarm that forces a control room annunciator alarm when 100 psig is exceeded.

The Unit Supervisor and the Nuclear Shift Operator were removed from duty and worked to develop the modified Operations Start-Up plan based on the event. Both were counseled with respect to this event and returned to duty.

IEDA

January 7, 2002 U.S. Nuclear Regulatory Commission Page 2

Any other actions described in the submittal represent intended or planned actions by DNPS. They are described for the NRC's information and are not regulatory commitments.

If you have any questions, please contact Dale Ambier, Regulatory Assurance Manager at (815) 416-2800.

Respectfully,

Preston Swafford Site Vice President

Dresden Nuclear Power Station

Enclosure

cc: Regional Administrator - NRC Region III

NRC Senior Resident Inspector - Dresden Nuclear Power Station

NRC FOR (7-2001)	LICENS	U.S. NUCLEAR REGULATORY COMMISSION NT REPORT (LER)				Estimated burden per response to comply with this mandatory information collection request 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet email to bjst@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.									
1. FACILITY NAME						2. DOCKET NUMBER					3. PAGE				
Dresden Nuclear Power Station Unit 2					05000237				1 OF 3						
4. TITLE	Unit 2 Sc	cram due	e to Inc	reased Fi	rst S	tage T	Turbir	ne Pres	sur	e					
5. EVENT DATE			6. LER NUMBER 7			7. F	REPORT DATE			8. OTHER			FACILITIES INVOLVED		
МО	DAY	YEAR	YEĀR	SEQUENTIAL NUMBER	REV	МО	DAY	YEAR	FACILITY NAME N/A		DOCKET NUMBER N/A				
11	07	2001	2001	- 005 -	00	01	07	2002	FACILITY NAME N/A		DOCKET NUMBER N/A				
9. OPERA	TING			11. THIS REP	ORT IS	SUBMIT	TED PU	RSUANT T	O TI	IE REQUIREM	ENTS OF	10 CFR	: (Check all th	at apply)	
MODE 2		2	20.2201(b) 20.		20.220	2203(a)(3)(ii)		50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)					
10. POWER LEVEL			20.2201(d)			20.2203(a)(4)			50.73(a)(2)(iii)			50.73(a)(2)(x)			
		008	20.2203(a)(1)		50.36(c)(1)(i)(A)		X 50.73(a)(2)(iv)(A)		73.71(a)(4)						
- 19				2203(a)(2)(i)		50.36(c)(1)(ii)(A)		50.73(a)(2)(73	.71(a)(5)		
				20.2203(a)(2)(ii)		50.36(c)(2)			50.73(a)(2)(v)(B)		OTHER Specify in Abstract below or in NRC Form 366A				
				20.2203(a)(2)(iii)		50.46(a)(3)(li)			50.73(a)(2)(v)(C)						
		: 10		20.2203(a)(2)(v)		50.73(a)(2)(i)(A) 50.73(a)(2)(i)(B)		50.73(a)(2)(v)(D)							
		, J						_	50.73(a)(2)(vii)						
		20.2203(a)(2)(vi)		50.73(a)(2)(i)(C) 50.73(a)(2)(ii)(A)			50.73(a)(2)(viii)(A)			-\cdot\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\					
(*)	9 3, 3	2	20.2	2203(a)(3)(i)	1105			A) CT FOR T	LIIC	50.73(a)(2)(viii)(R)	1.8000			
NAME				12	LICE	NSEE	LUNIA	CIFURI		EPHONE NUM	ARER IInci	ude Area	Code		
	P. Heister	rman							(815) 416-2815						
THROTHY	r. Heister		ADI ETE	ONE LINE FO	DE EA	CH CO	MOONE	NT EAU I	IRE	DESCRIBE					
CAUSE	SYST		IPONENT	MANU- FACTURER	HEP	ORTABLE O EPIX	. (6)	CAUSE	JIN L	SYSTEM	СОМРО		MANU- FACTURER	REPORTABLE TO EPIX	
VES		esc.	- 4	L REPORT E			x N	0	1	15. EXPE SUBMIS DAT	SION	MON	TH DAY	YEAR	

ADDDOVED BY OMD NO 2150 0104 EVEIDES 7.21 2004

16. ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On November 7, 2001, during start-up from D2R17 refueling outage, Dresden Nuclear Power Station Unit 2 automatically scrammed from 8 percent power in Mode 2. Initial investigation revealed that the high-pressure turbine first stage pressure had risen during shell warming activities, which defeated the stop valve closure scram bypass. As shell warming increased, a reactor scram was initiated when this high-pressure was sensed along with the turbine stop valves being closed.

The Root Cause has been determined to be inadequate human performance in that the turbine first stage pressure setpoint was inadequately monitored (as required by procedure) due to it not being considered a critical parameter required for turbine startup. The corrective action to prevent recurrence was to train Operations on this event regarding the effect on Unit 2 with respect to turbine first stage SCRAM setpoint changes due to Implementation of Extended Power Uprate and the relationship between shell warming and its impact on RPS logic. Included in the training was the relationship between the pressure versus power.

All automatic protection responses, including reactor trip and its associated actuations were verified to have functioned properly as a result of the reactor trip signal. Based on the above, it is concluded that the event did not adversely impact the health and safety of the public. The safety significance for this event is considered minimal.

APPROVED BY OMB NO. 3150-0104 NRC FORM 366A U.S. NUCLEAR REGULATORY EXPIRES 07/31/2004 COMMISSION (7-2001) Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the information and Records Management Branch (t-6 (33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001. LICENSEE EVENT REPORT (LER) and to the Paperwork Reduction Project (3150-0104), Office Of Management TEXT CONTINUATION And Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection. DOCKET NUMBER (2) LER NUMBER (6) FACILITY NAME (1) PAGE (3) YEAR REVISION SEQUENTIAL NUMBER NUMBER Dresden Nuclear Power Station Unit 2 05000237 2001 005 00 2 of 3

(If more space is required, use additional copies of NRC Form 366A)(17)

Plant Conditions Prior to Event: A.

Unit: 02

Event Date: 11-07-2001

Mode Name: Startup

Event Time: 2003

Reactor Mode: 2 Power Level: 8 percent Reactor Coolant System Pressure: 930 psig

B. **Description of Event:**

This event is being reported in accordance with 10 CFR 50.73 (a)(2)(iv)(A), which requires the reporting of any event or condition, which resulted in manual or automatic actuation of the Reactor Protection System (RPS).

On November 07, 2001 at 2003 hours, Dresden Nuclear Power Station (DNPS) Unit 2 automatically scrammed from 8 percent power in Mode 2 following a scheduled refueling outage. Initial investigation revealed that highpressure turbine first stage pressure which was procedurally required to be maintained between 60 - 100 psig. had risen during shell warming to defeat the stop valve closure SCRAM bypass. A reactor scram was initiated when this high-pressure was sensed along with the turbine stop valves being closed.

During the fall outage for Unit 2 (D2R17) a new high-pressure turbine and cross around relief valves (CAR) were installed. Extensive work on all other turbine valves was also performed. In preparation for Extended Power Uprate (EPU), the reactor SCRAM bypass setpoint was also lowered from 292 psig to 209 psig. This setpoint is derived from the turbine first stage pressure. In addition, the CAR valve minimum setpoints were raised from 261 psig to 297 psig. In previous startups the CAR valves could lift prior to achieving the pressure setpoint when the scram bypass signal would be disabled. Also during previous startups, the turbine would "roll" off the turning gear When shell pressure exceeded 120 psig and turbine first stage pressure would not exceed 150 psig. With the new high-pressure turbine, the Combined Intercept Valve (CIV) work and installation of the new CAR valves, the system was more pressure tight than previous startups. This allowed turbine first stage pressure to increase to a higher value than previously associated with the startup process.

At the time of the event, shell and chest warming had been in progress. Turbine startup was delayed for 24 hours due to increased sulfates in the reactor water, which prohibited entry into Mode 1. Additionally, several activities were being conducted in the control room, which provided distractions to the startup evolution. Finally, the NSO that began the shell warming activities was sent to Just In Time (JIT) training in preparation for the turbine roll.

Past experience had shown that when the turbine first stage pressure was high, the turbine rolled off of the gear and adjustment would be required to the turbine stop valve to reduce pressure. During this event when the turbine was placed back on gear, the operator had a false sense of security during this evolution that the first stage pressure had been controlled. The Unit Supervisor and Shift Manager were aware of the turbine rolling off of gear. This was identified as a possibility in the turbine startup procedure. When this occurred, the turbine was placed back on gear and turbine preparation continued. When the turbine first stage pressure exceeded 209 psig, the reactor SCRAM bypass was disabled. Due to the turbine stop valves being closed, the Reactor Protection System (RPS) [JC] logic to initiate a full reactor SCRAM was enabled.

NRC FORM 366A U.S. NUCLE COMMISSION	AR REGULATORY	APPROVED BY OMB NO. 3150-0104 EXPIRES 07/31/2004						
LICENSEE EVENT REPORT TEXT CONTINUATION	collection reques licensing proces burden estimate (33), U.S. Nuck and to the Pape And Budget, W. display a curren	datory information corporated into the mments regarding ement Branch (t-6 DC 20555-0001, a Of Management offection does not any not conduct or the information						
FACILITY NAME (1)	DOCKET NUMBER (2)		LER NUMBER (6))	PAGE (3)			
Dresden Nuclear Power Station Unit 2	05000237	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER				
		2001	005	-00	3 of 3			

(If more space is required, use additional copies of NRC Form 366A)(17)

C. Cause of Event:

The root cause of the event was determined to be inadequate human performance in that turbine first stage pressure setpoint was inadequately monitored (as required by procedure) due to it not being considered a critical parameter required for turbine startup. (NRC Cause Code A)

D. Safety Analysis:

All automatic protection responses, including reactor trip and its associated actuations were verified to have functioned properly as a result of the reactor trip signal. Based on the above, it is concluded that the event did not adversely impact the health and safety of the public. The risk for this event is considered minimal and there was no increase in Core Damage Frequency (CDF).

E. Corrective Actions:

Training on this event was provided to Operations regarding the effect on Unit 2 with respect to turbine first stage SCRAM setpoint changes due to implementation of Extended Power Uprate and the relationship between shell warming and its impact on RPS logic.

Enforcement of expectations with regard to adherence to established operations standards was performed by the Shift Operations Supervisor (SOS) to all Operations crews.

Panel monitoring expectations were established by the SOS and incorporated into Operations standing orders.

Revised the operations procedure for Main Turbine Startup, to include a requirement to place an operator selected alarm that forces a control room annunciator alarm when 100 psig for first stage pressure is exceeded.

The Unit Supervisor and the Nuclear Shift Operator were removed from duty and worked to develop the modified Operations Start-Up plan based on the event. Both were counseled with respect to this event and returned to duty.

F. Previous Occurrences:

A review was conducted via a search of previous events of this type. No events of this type were found for DNPS.

G. Component Failure Data:

N/A